

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

WILLIAM E. DUGAN, *et al.*, )  
                                    )  
                                    Plaintiffs, ) CIVIL ACTION  
                                    )  
vs.                               ) NO. 08 C 0296  
                                    )  
GI-LA BUILDERS, INC., an     ) JUDGE JOHN W. DARRAH  
Illinois corporation,          )  
                                    )  
Defendant.                    )

**MOTION FOR ENTRY OF DEFAULT AND  
FOR AN ORDER DIRECTING AN AUDIT**

NOW COME Plaintiffs, by their attorneys, and move for entry of default and for an order directing an audit of the payroll books and records of GI-LA BUILDERS, INC., an Illinois corporation, Defendant herein, said Defendant having failed to answer or otherwise plead to the Complaint and an audit being necessary to liquidate Plaintiffs' claims.

On February 3, 2008, the Summons and Complaint was served on the Registered Agent by tendering a copy of said documents to him personally at his place of business (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on February 23, 2008. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default.

/s/ Jennifer L. Dunitz-Geiringer

**CERTIFICATE OF SERVICE**

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participants on or before the hour of 5:00 p.m. this 4th day of March 2008:

Mr. Frank Gill, Registered Agent/President  
Gi-La Builders, Inc.  
1121 W. 171<sup>st</sup> Street  
East Hazel Crest, IL 60429

Mr. Frank Gill, Registered Agent/President  
Gi-La Builders, Inc.  
2417 187<sup>th</sup> Place  
Lansing, IL 60438

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/s/ Jennifer L. Dunitz-Geiringer

Jennifer L. Dunitz-Geiringer  
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